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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates to Individual Case No.
 3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
 MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING SCHEDULING**

Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and Defendants Samsung SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI Brasil, Ltda., Samsung SDI (Malaysia) SDN Bhd., Samsung SDI Mexico S.A. de C.V., Shenzhen Samsung SDI Co. Ltd., and Tianjin Samsung SDI Co., Ltd. (collectively “Samsung SDI”) have conferred by and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

1 WHEREAS, on July, 30 2014, Dell served its Seventh Set of Interrogatories and Second
2 Set of Requests for Production on Samsung SDI.

3 WHEREAS, Samsung SDI responded and objected to Dell's Seventh Set of
4 Interrogatories and Second Set of Requests for Production on September 2, 2014.

5 WHEREAS, September 5, 2014 was the deadline to complete fact discovery in the Dell
6 action.

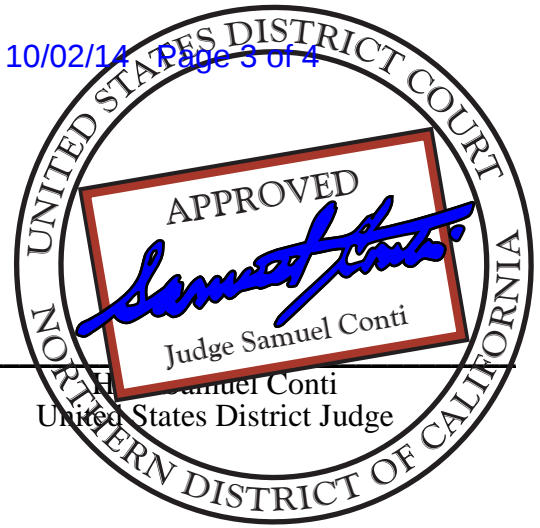
7 WHEREAS, September 12, 2014 is the deadline for all parties to object to or move to
8 compel additional responses for all written discovery responses in the Dell action.

9 WHEREAS, Dell and Samsung SDI continue to negotiate potential supplemental
10 responses and production of documents by Samsung SDI to Dell's Seventh Set of Interrogatories
11 and Second Set of Requests for Production.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between counsel as
13 follows: the deadline for Dell to move to compel additional responses for Dell's Seventh Set of
14 Interrogatories and Second Set of Requests for Production to Samsung SDI shall be moved to one
15 week following Samsung SDI's supplemental responses and production. If Dell and Samsung
16 SDI do not reach an agreement by September 19, 2014, Dell retains the right to move to compel
17 responses from Samsung SDI with respect to Dell's Seventh Set of Interrogatories and Second Set
18 of Requests for Production to Samsung SDI, with such motion to be submitted by September 19,
19 2014. All other dates in the Scheduling Order are unaffected by this stipulation.

20 * * *

21 The undersigned parties jointly and respectfully request that the Court enter this
22 stipulation as an order.
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 2, 2014

DATED: September 12, 2014

ALSTON & BIRD LLP

By: /s/ Debra D. Bernstein

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.